

Pavitt, John

From: Valdez, Heather
Sent: Friday, May 17, 2013 12:43 PM
To: Hedgpeth, Zach; Pavitt, John
Subject: RE: CISWI Testing protocol
Attachments: 2013 CISWI Final Reconsideration fr07fe13.pdf

Forgot to attach FR :)

Heather Valdez
Chemical Engineer
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(206) 553-6220
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R10 RICE Website, Engine Compliance Assistance  
[http://yosemite.epa.gov/R10/airpage.nsf/Enforcement/rice\\_rules](http://yosemite.epa.gov/R10/airpage.nsf/Enforcement/rice_rules)

Boiler Area Source Compliance Assistance  
<http://www.epa.gov/boilercompliance/>

Department of Energy Website on Energy Assessments  
[http://www1.eere.energy.gov/manufacturing/tech\\_deployment/energy\\_assessment.html](http://www1.eere.energy.gov/manufacturing/tech_deployment/energy_assessment.html)

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<http://www.combustionportal.org/>

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**From:** Valdez, Heather  
**Sent:** Friday, May 17, 2013 1:41 PM  
**To:** Hedgpeth, Zach; Pavitt, John  
**Subject:** FW: CISWI Testing protocol

Hi Zach, how are you? This is fyi, that I may request your assistance shortly in reviewing a testing protocol for an initial performance test for a CISWI incinerator unit. This might be a bit of work but I think it may be something we would want to try and do. The rule has been amended recently so I want to make sure that you have a current version if you want to refer to the rule. Attached is the FR notice for the final amendments.

Hi John, hope you are well also. Depending on when they schedule this test and your availability, I think that would be great if you were able to be on hand to witness the test. Is travel to the Pogo Mine in the not too distant future even a possibility?

I am working with ORC and OECA to understand when their drop dead date for testing is, but it looks like we would say that it would be Aug 7, 2013, the effective date of the amendments, or maybe they would have another 60 days to conduct but also submit results.

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From: Sally McLeod [<mailto:sally.mcleod@smpmpogo.com>]

Sent: Friday, May 17, 2013 1:25 PM

To: Valdez, Heather

Subject: Re: CISWI Testing protocol

Will do.

Sally McLeod
Environmental Superintendent
Sumitomo Metal Mining Pogo LLC

On May 17, 2013, at 12:09 PM, "Valdez, Heather" <Valdez.Heather@epa.gov> wrote:

Great Sally. Yes, I think that it would be appropriate to send that to ADEC as well. While they are delegated authority over the Title V program so that they can draft permits, they are not delegated for the general implementation of CISWI, so it is required that compliance information, notifications, and reports be submitted to the Region. However it is still important that they are aware of things for the sources they hold Title V permits for. There might even be a permit condition that you are subject to that could require the submission of the test protocol to ADEC, but I really do not know that.

One copy for our office will be sufficient.

Thanks

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**From:** Sally McLeod [<mailto:sally.mcleod@smmpogo.com>]  
**Sent:** Friday, May 17, 2013 12:53 PM  
**To:** Valdez, Heather  
**Subject:** Re: CISWI Testing protocol

Hi! Thank you for contacting me. We weren't sure who to send it to since the unit is on our current operation permit. Is it okay if we send it to ADEC as well? How many copies do you need?

Sally McLeod  
EnvironmentalSuperintendent  
Sumitomo Metal Mining Pogo LLC

On May 17, 2013, at 11:34 AM, "Valdez, Heather" <[Valdez.Heather@epa.gov](mailto:Valdez.Heather@epa.gov)> wrote:

Hi Sally, this last Wednesday the Alaska Oil & Gas Association gave a presentation to Acting Office of Air and Radiation, Assistant Administrator, Janet McCabe and staff members of the Senate Committee on Energy & Natural Resources on the Small Remote Incinerator category of CISWI (Commercial Industrial Solid Waste Incinerators).

Separate from that discussion about future testing, it was mentioned that you would soon be submitting a testing protocol for unit located at the Pogo Mine to Region 10 for review. I wanted to reach out to you to let you know that if you have any questions I am the Regional point of contact for the CISWI rule, and that you can address that testing protocol to my office, my contact information is below. Thanks.

Heather Valdez  
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EPA Region 10  
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